

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|--------------------------|---|------------------------|
| _____ |) | |
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Crim. No. 04-10339-PJB |
| |) | NH CR04-213-01-PB |
| TIMOTHY P. SCHROEDER, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

UNITED STATES' MOTION FOR DOWNWARD DEPARTURE
BASED UPON DEFENDANT SCHROEDER'S SUBSTANTIAL
ASSISTANCE TO LAW ENFORCEMENT AUTHORITIES

The United States, by its undersigned counsel, hereby moves for a downward departure pursuant to Section 5K1.1 of the United States Sentencing Guidelines.

As grounds for this Motion, the United States notes that defendant Schroeder substantially assisted in the prosecution of another person who has committed an offense. Specifically, by testifying at trial pursuant to his agreement with the United States Attorney, defendant Schroeder substantially assisted in the prosecution of Steven Milkiewicz.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

dated: December 16, 2005

By: /s/Paul G. Levenson
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